



EPA Region 5 Records Ctr.



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October 15, 2003

Mr. Kenneth Bardo
U.S. EPA Region V
Corrective Action Section
Enforcement Compliance Branch
77 West Jackson Boulevard DE-J9
Chicago, IL 60604-3507

Re: Solutia Inc. – W. G. Krummrich RCRA Corrective Action Quarterly Report

Dear Mr. Bardo:

This progress report is being submitted to you pursuant to Section VI 6b of the May 3, 2000 Administrative Order on Consent ("AOC") between Solutia Inc. (Solutia) and the United States Environmental Protection Agency (USEPA, or Agency). It summarizes the project activities over the period July 1, 2003 to September 30, 2003.

Work Performed in this Reporting Period

Meetings

A meeting between Solutia and USEPA personnel was held at the USEPA offices in Chicago on August 18, 2003. The purpose of this meeting was to discuss the results of the indoor air and soil vapor sampling carried out at the plant in support of the CA-725 Human Health Environmental Indicator. As well, a summary of the results of the soil sampling carried out to define the scope of the Corrective Measures Study was presented to the Agency and a proposed scope for the second phase of this study was presented to the Agency.

Human Health Environmental Indicator

A report summarizing the results of the indoor air and soil vapor sampling performed as part of the CA-725 Human Health Environmental Indicator was submitted to the Agency on August 5, 2003. The investigation demonstrated that none of the indoor air samples contained any organic constituents at concentrations in excess of the OSHA Permissible Exposure Levels (PELs) and that soil vapor did not appear to be contributing any significant amount of organic constituents to the indoor air. That report is currently being reviewed by USEPA.

A second round of indoor air and soil vapor sampling was carried out during the week of September 1, 2003. The samples are currently being analyzed and it is expected that the results of these analyses will be available in October 2003.

A report was submitted on August 14, 2003 that presented an evaluation of the current human health exposure pathways at the W. G. Krummrich facility. This evaluation was performed in support of the CA-725 Human Health Environmental Indicator and concluded that the only current exposure pathway of concern was potential dermal contact with surficial soils at the facility. The report recommended that a minimum thickness of 12 inches of gravel be placed in unpaved areas to prevent such exposure. Additional gravel will be required in some areas of the plant to satisfy this requirement.

During the August 18, 2003 meeting, the USEPA indicated that the current human health risks associated with sediments and surface water present in the groundwater to surface water discharge pathway should be investigated. It was noted that this pathway was evaluated as part of the risk assessment performed during the Area 2 Remedial Investigation and Feasibility Study being carried out by a group of Responsible Parties, including Solutia. The results of the risk assessment were submitted to the Agency on September 11, 2003.

Groundwater Migration Environmental Indicator

Groundwater sampling to delineate the northern and southern extent of the groundwater plume from the W. G. Krummrich Plant began in July and was completed at the end of September. This investigation is intended to satisfy the requirements of the Groundwater Migration Environmental Indicator (CA-750) evaluation.

Project Administration

Solutia replaced its Project Manager for the AOC in September and informed the USEPA of the change in a letter dated September 12, 2003. The new Project Manager is Gary W. Vandiver.

Problems Encountered

No technical problems were encountered during the reporting period.

Work Scheduled for Next Reporting Period

The following activities will begin in the fourth quarter of 2003:

- A report containing the results of the Phase I CMS sampling will be prepared and submitted to the USEPA. It is anticipated that this report will be completed by the end of October.

- A report on the plume delineation and characterization investigation completed in September is being prepared. It is expected that this report will be submitted to the USEPA in November.
- Gravel will be applied to various areas of the plant to ensure a minimum gravel thickness of 12 inches. The gravel application is expected to be complete by the middle of November.
- The second phase of the CMS investigation will begin in October and it is expected that the field work will be completed by the end of the year.

Sincerely,


Gary W. Vandiver
Project Manager

cc: Nabil Fayoumi, USEPA
Jim Moore, IEPA
Gina Search, IEPA
Sandra Bron, IEPA

Cathy Bumb, Solutia
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